

EXHIBIT A



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20JE-AC02991 - TIFFANY CRAFT V AMERICOLLECT, INC (E-CASE)

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09/29/2020

Notice of Court Hearing Sent

Civil Setting Scheduled

Scheduled For: 01/06/2021; 9:00 AM ; JEFFREY THOMAS COLEMAN; Jefferson

Hearing Continued/Rescheduled

CAUSE CONTINUED TO 1-6-2021 AT 9 A.M. DUE TO COVID-19. NOTICE SENT TO PRO SE LITIGANTS VIA USPS AT LAST KNOWN ADDRESS.

Hearing Continued From: 10/14/2020; 9:00 AM Civil Setting

09/02/2020

Response Filed

REVIEWED: TONY MANANSALA, ASSOCIATE CIRCUIT JUDGE DIV. TWELVE

Summons Issued-Associate

Document ID: 20-ADSM-2667, for AMERICOLLECT INC.

Civil Setting Scheduled

Associated Entries: 09/29/2020 - Hearing Continued/Rescheduled

Scheduled For: 10/14/2020; 9:00 AM ; JEFFREY THOMAS COLEMAN; Jefferson

Order

CASE SET FOR ANNOUNCEMENT SO ORDERED: JEFFREY COLEMAN, ASSOCIATE CIRCUIT JUDGE DIV. TEN

09/01/2020

Filing Info Sheet eFiling

Filed By: MATTHEW PAUL COOK

Pet Filed in Associate Ct

petition. JURY TRIAL DEMANDED SENT TO DIV 10 FOR APPROVAL

Filed By: MATTHEW PAUL COOK

On Behalf Of: TIFFANY CRAFT

Judge Assigned



IN THE 23RD JUDICIAL CIRCUIT, JEFFERSON COUNTY, MISSOURI

Judge or Division: JEFFREY THOMAS COLEMAN	Case Number: 20JE-AC02991
Plaintiff/Petitioner: TIFFANY CRAFT	Plaintiff's/Petitioner's Attorney/Address: MATTHEW PAUL COOK 2885 SANFORD AVENUE SW #42270 GRANDVILLE, MI 49418 () -
Defendant/Respondent: AMERICOLLECT INC	Date, Time and Location of Court Appearance: 14-OCT-2020, 09:00 AM Division 10 Courtroom P O BOX 100 300 MAIN ST HILLSBORO, MO 63050
Nature of Suit: AC Other Tort	

(Date File Stamp)

Associate Division Summons

The State of Missouri to: AMERICOLLECT INC

Alias:

SERVE REGISTERED AGENT, OFFICER, OR

EMPLOYEE:

1851 SALVERNO RD
MANITOWOC, WI 54221

COURT SEAL OF



JEFFERSON COUNTY

You are summoned to appear before this court on the date, time, and location above to answer the attached petition. If you fail to do so, judgment by default will be taken against you for the relief demanded in the petition. You may be permitted to file certain responsive pleadings, pursuant to chapter 517, RSMo. Should you have any questions regarding responsive pleadings in this case you should consult an attorney.

If you have a disability requiring special assistance for your court appearance, please contact the court at least 48 hours in advance of scheduled hearing.

SEPT 2, 2020

MICHAEL E. REUTER, CIRCUIT CLERK

BY /s/S.FLAHERTY, DEPUTY CLERK

Sheriff's or Server's Return

Note to serving officer: Service must not be made less than 10 days nor more than 60 days from the date the defendant/respondent is to appear in court. Service should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to:☐ other: _____ (name) _____ (title).

Served at _____ (address) in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer.

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est. \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, MISSOURI
ASSOCIATE CIRCUIT DIVISION**

Tiffany Craft,)	
Plaintiff,)	Case No.:
)	
vs.)	Div. No.:
)	
Americollect, Inc.)	
)	
Serve at:)	JURY TRIAL DEMANDED
Registered Agent, Officer or Employee)	
1851 S Alverno Rd)	
Manitowoc, WI 54211)	
Defendant,)	
)	
)	
)	

PETITION FOR DAMAGES

Comes now Plaintiff, Tiffany Craft, by and through counsel; Matthew P. Cook, and states the following:

INTRODUCTION AND JURISDICTION

1. This is an action for statutory damages brought by an individual consumer for violations of the Fair Debt Collections Practices Act, 15 U.S.C. §1692 *et. seq.* ("FDCPA").
2. This Court has jurisdiction of the FDCPA claim under 15 U.S.C. §1692k(d).

PARTIES

3. Plaintiff is a natural person currently residing in Jefferson County, Missouri. Plaintiff is a consumer within the meaning of the FDCPA. The alleged debt owed arises out of consumer, family and household transactions.
4. Defendant is a foreign limited liability company with its principal place of business located in Manitowoc, WI . The principal business purpose of Defendant is the collection of debts and Defendant regularly attempts to collect alleged debts owed.

5. Defendant is engaged in the collection of debts from consumers using the mail and telephone in Missouri. Defendant is a “debt collector” as defined by the FDCPA. 15 U.S.C §1692a(6).

FACTS

6. Defendant’s collection activity of which Plaintiff complains occurred within the previous twelve (12) months.

7. Defendant had been calling Plaintiff’s mobile phone in 2020 in an attempt to collect on this alleged debt.

8. When Plaintiff did not answer the phone Defendant would leave Plaintiff voicemails disclosing that that were a debt collector.

9. Defendant’s voicemails were communications to Plaintiff in their attempt to collect on the alleged debt owed by Plaintiff.

10. Defendant’s voicemails were heard by and disclosed to third-parties in violation of 15 U.S.C. §1692c(b).

11. Defendant’s collection attempts have caused Plaintiff to incur actual damages, attorney’s fees, as well as emotional distress and/or denial of credit.

COUNT I: VIOLATION OF THE FDCPA

12. Plaintiff re-alleges and incorporates by reference the above paragraphs.

13. Defendant regularly attempts to collect consumer debts asserted to be due to another and at all relevant times herein, was a “debt collector” as defined by 15 U.S.C. §1692a(6).

14. A single action on part of a debt collector can violate multiple sections of the FDCPA.

15. In its attempts to collect the alleged debt from Plaintiff, Defendant has committed violations of the FDCPA, 15 U.S.C. §1692 *et. seq.* including, but not limited to the following:

a. Defendant’s left multiple voicemails that were heard by and disclosed to third-parties in violation of 15 U.S.C. §1692c(b).

WHEREFORE, Plaintiff respectfully requests that judgment be entered against Defendant for:

- A. Declaratory judgment that Defendant's conduct violated the FDCPA;
- B. Actual damages;
- C. Release of the alleged debt;
- D. Statutory damages, costs, litigation expenses and attorney's fees pursuant to 15 U.S.C. §1692(k); and
- E. For such other relief as the Court may deem just and proper.

By: /s/ Matthew P. Cook
Cook Law, LLC
Matthew P. Cook #62815
Attorney for Plaintiff
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Grandville, MI 49418
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